

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT

Conditional Major, Operating

Permit: F-07-035

Promotional Wood Products, LLC

Boston, Kentucky 40107

June 4, 2007

Frough Sherwani, Reviewer

SOURCE ID: 021-179-00055

AGENCY INTEREST: 40421

ACTIVITY: APE20070001

SOURCE DESCRIPTION:

Promotional Wood Products, LLC operates a wooden novelty boxes manufacturing facility for liquor industry in Boston, Kentucky. The source is currently operating under the authority of permit no F-01-040.

On March 1, 2007, the Division received a renewal application for their conditional major permit. Since the issuance for that permit, there are no changes to wood working equipment activity, spray coating lines including guns, types of coatings sprayed and rates of capacity.

Emission Point # 01: Spray Booth # 01

MP1: Manual Spray Gun

This point is for spray gun. The "PTE" is based on 28.13 gallons per hour. The estimated transfer efficiency of the system is 60%. The Potential -to- emit (PTE) based on 380 hrs per year due to the batch process.

Emission Point # 02: Spray Booth # 03

MP1: Manual Spray Gun

This point is for spray gun. The "PTE" is based on 28.13 gallons per hour. The estimated transfer efficiency of the system is 60%. The Potential -to- emit (PTE) is based on 380 hrs per year due to the batch process.

Emission Point # 03: Spray Booth # 3

MP1: Automated Spray Gun

This point is for spray gun. The "PTE" is based on 3.0 gallons per hour. The estimated transfer efficiency of the system is 60%. The Potential -to- emit (PTE) is based on 1140 hrs per year due to the batch process.

Emission Point # 04: Spray Booth # 4

MP1: Automated Spray Gun

This point is for spray gun. The “PTE” is based on 6.0 gallons per hour. The estimated transfer efficiency of the system is 60%. The Potential -to- emit (PTE) based on 1140 hrs per year due to the batch process.

Emission Point # 05: Misc. Wood Working

This point is for miscellaneous wood working operations. The consumption of wood for this process is 0.3 ton per hour. This is an insignificant activity.

Type of control and efficiency:

Emission points # 01, 02, 03 and 04 have fabric filters to control particulate matter. The estimated control efficiency of each filter is 90%. For emission point # 05, particulate matter is controlled by a baghouse, which has an estimated collection efficiency of 80%.

Emission factors and their source:

AP –42 5th edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

Applicable regulation

401 KAR 52:030, Federally-enforceable permits for nonmajor sources.

401 KAR 59:010, New process operations, applies to these emissions points because these are process operations that were commenced after July 2, 1975.

EMISSION AND OPERATING CAPS DESCRIPTION:

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than 90 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
3. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.